

## **U.S. Department of Justice**

United States Attorney Eastern District of New York

EAG/JDG/CMP F.#2008R00530 271 Cadman Plaza East Brooklyn, New York 11201

March 13, 2012

## By ECF and Fed Ex

Adam D. Perlmutter, Esq. 260 Madison Avenue, Suite 1800 New York, NY 10016

Samuel M. Braverman, Esq. 901 Sheridan Avenue Bronx, NY 10451

Susan Kellman, Esq. 25 8th Avenue Brooklyn, NY 11217

Re: United States v. Thomas Gioeli, et al.

Criminal Docket No. 08-240 (BMC)

## Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure and/or the government's obligations under <u>Brady v.</u> <u>Maryland</u>, 373 U.S. 83 (1963), the government hereby furnishes the following additional discovery in the above-captioned case.

EXHIBIT	<u>DESCRIPTION</u>
1457	Dental x-rays of William Cutolo
1458	Dental chart of William Cutolo
1459	Surveillance photographs taken on March 18, 1993
1460	Property records for 101 Glengariff Road, Massapequa Park, NY

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EXHIBIT	DESCRIPTION
1461	Crime scene unit photographs taken on June 5, 1995 of Chemical Bank of Hempstead Turnpike, East Meadow, NY
1462	Folder provided by employee at 2559-2561 Stillwell Avenue pursuant to "forthwith" subpoena
1463	Ballistics reports and trace reports for the guns seized at 475 Avenue Y, Brooklyn, New York in March 2005
1464	DVD containing surveillance video of Gioeli, Calabro and others on April 4, 2001
1465	Photograph taken at Romantique Limousines in Brooklyn on February 4, 1997
1466	Organized crime chart
1467	CD containing the results of a search of a cellular telephone recovered from Dino Saracino on June 23, 2008 (these results were previously provided in another format in DX 894)
1468	Scanner obtained from Joseph Competiello

If you have any questions or requests, please contact us.

Sincerely,

LORETTA E. LYNCH United States Attorney

By: /s/ Cristina M. Posa
Elizabeth A. Geddes
James D. Gatta
Cristina M. Posa
Assistant U.S. Attorneys

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cc: All Counsel (by ECF) (w/o enclosures)
Clerk of the Court (BMC) (by ECF) (w/o enclosures)
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